

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
Margaux Poueymirou (SBN 356000)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com
mpoueymirou@bsfllp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Counsel for Individual and Representative Plaintiffs
and the Proposed Class*

(additional counsel included below)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD
BE SEALED RE: REPLY TO SUMMARY
JUDGMENT AND OPPOSITION TO
META'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Reply to Motion for Partial Summary Judgment and Opposition to Meta’s Motion for Partial Summary Judgment. The Motion and accompanying exhibits contain material that Defendant Meta Platforms, Inc. (“Meta”), as well as third parties HarperCollins Publishers (“HarperCollins”) and Hachette Book Group (“Hachette”) have designated as “Confidential,” “Highly Confidential - Attorneys Eyes Only” and “Highly Confidential – Source Code” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”).

PLAINTIFFS’ OPPOSITION AND REPLY		
Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Reply to Motion for Partial Summary Judgment and Opposition to Meta’s Motion for Partial Summary Judgment	Highlighted Portions	Refers to material designated by Meta, HarperCollins, and Hachette as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 97	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 98	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 99	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 100	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 101	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 102	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Exhibit 103	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 104	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 105	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 106	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 107	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 108	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 109	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 110	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 111	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 112	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 113	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 114	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 115	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 116	Full Document	Designated by Meta as “Confidential”
Exhibit 117	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 118	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 119	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Exhibit 120	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 121	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 122	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 123	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 124	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 125	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 126	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 128	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 129	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 130	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 131	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 132	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 133	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 134	Full Document	Designated by Hachette as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 135	Full Document	Designated by HarperCollins as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 136	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 137	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Exhibit 138	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 139	Full Document	Designated by HarperCollins as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 140	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 141	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 142	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 143	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 144	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 146	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Source Code”
Exhibit 147	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Source Code”
Exhibit 148	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
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Exhibit 160	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 163	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

BUTTERICK DECLARATION		
Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Declaration of Matthew Butterick in Support of Plaintiffs’ Brief	Highlighted Portions	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit A	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit B	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Plaintiffs provisionally file the above-referenced documents under seal subject to the Designating Parties’ forthcoming sealing motions. Plaintiffs assert no confidentiality of their own over these documents and are prepared to file them publicly.

Dated: April 7, 2025

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

Elizabeth J. Cabraser (SBN 083151)
Daniel M. Hutchinson (SBN 239458)
Reilly T. Stoler (SBN 310761)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
(415) 956-1000
ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

Rachel Geman (*pro hac vice*)
250 Hudson Street, 8th Floor
New York, New York 10013-1413
(212) 355-9500
rgeman@lchb.com

Kenneth S. Byrd (*pro hac vice*)
Betsy A. Sugar (*pro hac vice*)
222 2nd Avenue South, Suite 1640
Nashville, TN 37201
(615) 313-9000
kbyrd@lchb.com
bsugar@lchb.com

JOSEPH SAVERI LAW FIRM LLP

Joseph R. Saveri (SBN 130064)
Cadio Zirpoli (SBN 179108)
Christopher K.L. Young (SBN 318371)
Holden Benon (SBN 325847)
Aaron Cera (SBN 351163)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsflfp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
Margaux Poueymirou (SBN 356000)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsflfp.com
jstein@bsflfp.com
mpoueymirou@bsflfp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsflfp.com
jschuffenhauer@bsflfp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsflfp.com
dsimons@bsflfp.com

*Interim Lead Counsel for Individual and
Representative Plaintiffs and the Proposed Class.*

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)
Alexander J. Sweatman (*pro hac vice*)
Mohammed A. Rathur (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312) 782-4880
bclobes@caffertyclobes.com
asweatman@caffertyclobes.com
mrathur@caffertyclobes.com

DICELLO LEVITT LLP

Amy Keller (*pro hac vice*)
Nada Djordjevic (*pro hac vice*)
James Ulwick (*pro hac vice*)
10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
(312) 214-7900
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com

David Straite (*pro hac vice*)
485 Lexington Avenue, Suite 1001
New York, New York 10017
(646) 933-1000
dsraite@dicellolevitt.com

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
(323) 968-2632
mb@buttericklaw.com

**COWAN DEBAETS ABRAMS &
SHEPPARD LLP**

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole
60 Broad Street, 30th Floor
New York, NY 10004
(212) 974-7474
ssholder@cdas.com
ccole@cdas.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*